

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Application of CHEVRON CORPORATION
for an order Pursuant to 18 U.S.C. § 1782 to
Conduct Discovery from MCSquared PR,
Inc.,

Petitioner.

Case No. 14 MC 392 (LAK)

**DECLARATION OF ERIC W. BLOOM IN SUPPORT OF
PROPOSED INTERVENOR THE REPUBLIC OF ECUADOR'S
REPLY TO ITS MOTION TO QUASH OR MODIFY SUBPOENA,
FOR IN CAMERA REVIEW, AND, IN THE ALTERNATIVE, FOR
RECIPROCAL DISCOVERY AND ISSUANCE
OF A PROTECTIVE ORDER**

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DECLARATION OF ERIC W. BLOOM

ERIC W. BLOOM, an attorney admitted to practice *pro hac vice* before this Court, affirms the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a member of the firm Winston & Strawn LLP (“Winston”) and counsel for Proposed Intervenor, the Republic of Ecuador (the “Republic”), in this and related actions.

2. I submit this declaration in support of the Reply in support of the Republic’s Motion to Quash or Modify Subpoena, For In Camera Review, and in the Alternative for Reciprocal Discovery and Issuance of a Protective Order.

3. Attached as Exhibit 1 is a true and accurate copy of the order in *Chevron Corp. v. Snaider*, No. 14-cv-01354 (D. Colo. Jan 15, 2015).

4. Attached as Exhibit 2 is a true and accurate excerpt of the April 29, 2014 hearing transcript in *Chevron Corp. v. Republic of Ecuador*, PCA Case No. 2009-23.

5. Attached as Exhibit 3 is a true and accurate excerpt of the April 19, 2007 hearing transcript in *Republic of Ecuador v. ChevronTexaco Corp.*, No. 04-cv-8378 (S.D.N.Y. Apr. 19, 2007).

6. Attached as Exhibit 4 is a true and accurate excerpt of the January 20, 2014 hearing transcript in *Chevron Corp. v. Republic of Ecuador*, PCA Case No. 2009-23.

7. Attached as Exhibit 5 is a true and accurate copy of the June 25, 2009 letter to U.S. Trade Representative Ron Kirk from Senators Leahy, Wyden, Durbin, and Casey.

8. Attached as Exhibit 6 is a true and accurate copy of an email (produced in redacted form) of September 7, 2007, between U.S. State Department officials David Edwards and Sigrid Ernich.

9. Attached as Exhibit 7 are true and accurate copies of documents produced in discovery to the Republic by Diego Borja reflecting Chevron payments to him.

10. Attached as Exhibit 8 is a true and accurate copy of a January 27, 2013 contract between Chevron and Alberto Guerra Bastidas.

11. Attached as Exhibit 9 is a true and accurate excerpt of Chevron's Supplemental Reply Memorial in *Chevron Corp. v. Republic of Ecuador*, PCA Case No. 2009-23 (Jan. 14, 2015).

Dated: January 21, 2015
Washington, DC

/s/ Eric W. Bloom
Eric W. Bloom